

REMARKS

The Official Action mailed May 25, 2006, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on August 30, 1999; April 26, 2001; March 5, 2002; April 12, 2002; September 8, 2005; November 18, 2005; March 1, 2006; and March 30, 2006.

Further, an Information Disclosure Statement is submitted herewith and consideration of this Information Disclosure Statement is respectfully requested.

Claims 7-26 are pending in the present application, of which claims 7, 11, 15, 19 and 23 are independent. The independent claims have been amended to better recite the features of the present invention. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 3 of the Official Action rejects claims 7-26 as obvious based on the combination of U.S. Patent No. 6,586,874 to Komoto and U.S. Patent No. Re. 36,792 to Sonehara. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in

the art. “The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art.” In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims. Independent claims 7, 11, 15, 19 and 23 recite that at least a part of a white light introduced to a counter substrate is reflected on a pixel electrode so as not to pass through an active matrix substrate. For the reasons provided below, Komoto and Sonehara, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.

The Official Action asserts that Komoto teaches that “white light emitted from the light source [22] is introduced into said active matrix substrate [32, see Fig. 16, col. 19, lines 25-61] from sides of said liquid crystal panel is reflected on the pixel electrode so as not to pass through the active matrix substrate [see Fig. 18, col. 20, lines 27-45]” (page 4, Paper No. 20060522; Figures 16 and 18, reproduced below).

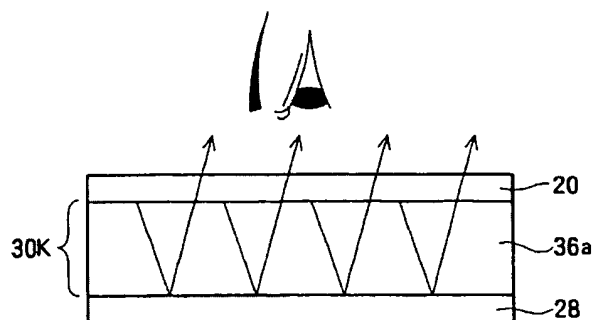


FIG. 18

However, as shown in Figure 16 of Komoto, the pixel electrode 34 is an element included in light adjustment section 30j. On the other hand, in Figure 18 of Komoto, the light introduced to the light adjustment section 30k is reflected by the reflection plate 28. The reflection plate 28 is clearly distinguished from the light adjustment section 30k, e.g. Komoto teaches that “the light adjustment section 30k is stacked on a reflection plate 28” (column 20, lines 31-32). Hence, even if one were motivated to replace the light adjustment section 30k of Figure 18 with the light adjustment section 30j of Figure 16, the introduced light would not be reflected by pixel electrode 34. The light would, hypothetically, be reflected by the reflection plate 28; however, a reflection plate 28 is

not a pixel electrode. Therefore, Komoto does not teach or suggest that at least a part of a white light introduced to a counter substrate is reflected on a pixel electrode so as not to pass through an active matrix substrate.

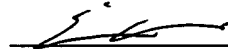
Sonehara does not cure the deficiencies in Komoto. Sonehara is relied upon to allegedly teach "at least a part of the white ray of the light source [12] introduced to ... the upper substrate" (page 4, Paper No. 20060522). However, Komoto and Sonehara, either alone or in combination, do not teach or suggest that Komoto could or should be modified such that at least a part of a white light introduced to a counter substrate is reflected on a pixel electrode so as not to pass through an active matrix substrate.

Also, independent claims 7, 11, 15, 19 and 23 have been amended to remove features which are not believed to be critical to the patentability of the claims. Specifically, the feature of "a battery" has been removed from the independent claims.

Since Komoto and Sonehara do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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